

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

FAMILIES BELONG TOGETHER -
WASHINGTON COALITION and
MOHAMMED KILANI,

Plaintiffs,

v.

THE CITY OF SEATAC, and JEFF
ROBINSON, AS AN INDIVIDUAL AND AS
AN EMPLOYEE OF SEATAC,

Defendants.

NO. 2:18-CV-01847 MJP

JOINT STATUS REPORT

The parties certify that they held the initial conference of counsel required under Fed. R. Civ. P. 26(f) on July 12, 2019. As a result of this conference the parties have consulted and developed this proposed discovery plan and status report.

Pursuant to Fed. R. Civ. P. 26(f)(3), and Local Civ. R. 16 and 26(f), and this Court's April 11, 2019 Order Regarding Initial Disclosures, Joint Status Report, And Early Settlement, the parties jointly submit this Proposed Discovery Plan and Status Report, and request the Court set by order the dates proposed below for proceedings in this matter.

1. Nature and complexity of the case:

This case involves the City of SeaTac's municipal code provision pertaining permitted demonstrations and parades. The Plaintiffs allege that the ordinance is impermissibly vague, that

1 it impermissibly authorizes the city to charge unreasonable and exorbitant fees for permitted events
 2 that impermissibly infringes on Plaintiffs' right to free speech and assembly and that the City
 3 impermissibly charged an unreasonable and exorbitant fee in this particular case. The City denies
 4 Plaintiffs' allegations.

5 2. Proposed deadline for joining additional parties. The parties proposed deadline for joining
 6 additional parties is September 2, 2019.

7 3. Magistrate judge. The parties do not consent to having the case assigned to a magistrate
 8 judge.

9 4. Proposed discovery plan addressing items set forth in FRCP 26(f)(3):

10 A. Initial disclosures. **July 29, 2019**, per Court's Order Regarding Initial Disclosures,
 11 Joint Status Report, and Early Settlement.

12 B. Subjects, timing, and potential phasing of discovery.

13 a. Subjects: The parties will seek discovery regarding the facts, events and
 14 circumstances as alleged in the pleadings.

15 b. Timing: The parties have no suggestions outside of the court rules.

16 c. Potential Phasing: The parties have no suggestions outside of the court rules.

17 C. Electronically Stored information ("ESI"): The parties do not anticipate any ESI
 18 issues.

19 D. Privilege issues. The parties do not anticipate that this action will involve the
 20 discovery of confidential, proprietary, or private information for which special
 21 protection may be warranted. If such issues arise, then the parties will attempt to
 22 confer in good faith with respect to a stipulated protective order according to the
 23 local rules.

24 E. Proposed limits on discovery. The parties do not anticipate the need to limit
 25 discovery other than the limits imposed by the court rules.
 26

- 1 F. Discovery related orders. None expected at this time, and the parties agree to work
2 in good faith to resolve discovery issues that may arise.
- 3 5. The parties' views, proposals and agreements on the items set forth in LCR 26(f)(1):
- 4 A. Prompt case resolution. The parties agree to work cooperatively to resolve this
5 case, if possible, in the most expedient manner possible.
- 6 B. Alternative dispute resolution ("ADR"). The parties agree to participate in
7 mediation at least 30 days prior to the trial date.
- 8 C. Related cases. None at this time.
- 9 D. Discovery management. The parties agree to work cooperatively to manage
10 discovery in a cost-efficient manner.
- 11 E. Anticipated discovery sought. Plaintiffs will seek discovery concerning all claims
12 against Defendants.
- 13 F. Phasing motions. N/A
- 14 G. Preservation of discoverable information. The parties agreed to preserve
15 discoverable information.
- 16 H. Privilege issues. None at this time, other than noted in 4.D. above.
- 17 I. Model Protocol for discovery of ESI. The parties agree to the model protocol for
18 discovery of ESI.
- 19 J. Alternatives to Model Protocol. None.
- 20 6. The date by which discovery can be completed: The parties propose a discovery deadline
21 of May 4, 2020.
- 22 7. Bifurcation: The parties do not believe bifurcation will be necessary.
- 23 8. Pretrial statements and pretrial orders: The parties do not believe that pretrial statements
24 and the pretrial order should be dispensed.
- 25 9. Other suggestions for shortening or simplifying the case: None at this time.
- 26 10. Date the case will be ready for trial: July 13, 2020.

11. Jury or non-jury: Plaintiff has demanded a jury.
12. Total number of trial days required: 5 trial days
13. Names, addresses, and telephone numbers of trial counsel.

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14. Dates on which trial counsel may have complications to be considered in setting a trial

date:

Plaintiff's counsel has the following trial conflicts: None at this time from July 13, 2020
forward.

Defendant's counsel: Same.

15. Report service and proposed scheduling. All parties have been properly served, so no proposed schedule for this purpose is needed.

16. Does any party wish a scheduling conference before the court enters a scheduling order in the case? No

17. Dates that nongovernmental corporate parties filed disclosure statements:

DATED this 29th day of July, 2019.

**PETERSON | WAMPOLD | ROSATO
FELDMAN | LUNA**

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the date shown below I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Dated: July 29, 2019.

/s/Dana Vizzare

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